

Federal Defenders  
OF NEW YORK, INC.

Southern District  
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*Interim Executive Director  
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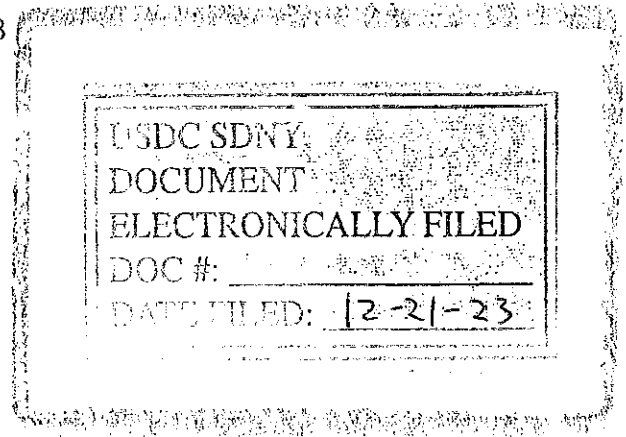
*Southern District of New York  
Jemifer L. Brown  
Attorney-in-Charge*

December 21, 2023

**BY ECF**

Hon. Lewis A. Kaplan  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: **United States v. Kahron Robinson**  
**23 Cr. 665 (LAK)**



Dear Judge Kaplan,

Kahron Robinson, through undersigned counsel, respectfully requests a bail modification to grant permission to spend Christmas and New Year's Eve with his family at his grandmother's home.

Mr. Robinson was released on September 29<sup>th</sup>, 2023, on a \$50,000 Personal Recognizance Bond, that was co-signed by two financially responsible persons, with travel restricted to the Southern and Eastern districts of New York and supervision under Pre-Trial Services. His conditions were modified on October 26, 2023, to include home detention enforced by location monitoring. Last month, Mr. Robinson was given permission to spend Thanksgiving at his grandmother's home (address provided to Pretrial). He was completely compliant with the schedule set by the Court and enforced by Pretrial.

Mr. Robinson requests permission to spend December 25 (Christmas) and December 31 (New Year's Eve) with his family again at his grandmother's home. Specifically, Mr. Robinson requests the following schedule:

December 25: Permission to visit his grandmother's home at 5:00 PM, returning to his home by 10:00 PM.

December 31: Permission to visit his grandmother's home at 5:00 PM, returning to his home by 1:00 AM on January 1, 2024.

Undersigned counsel conferred with the Pretrial Services Agency and the Government about this request. Pretrial reports that it "has no position on the defendant's holiday travel to his grandmother's residence as long as court approval is given." The Government takes no position.

Respectfully submitted,

/s/ Zawadi Baharanyi.

Zawadi Baharanyi

Assistant Federal Defenders

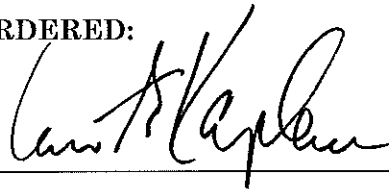
Federal Defenders of New York

(212) 417-8735

cc: AUSA Emily Deininger

USPSO Dominique Jackson

SO ORDERED:



HONORABLE LEWIS A. KAPLAN

United States District Judge

12/21/23